

SHELDON R. POOLE
SPOOLE@GRSM.COM
DIRECT DIAL: (860) 494-7523

GORDON & REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
95 GLASTONBURY BLVD, SUITE 206
GLASTONBURY, CT 06033
WWW.GRSM.COM

February 25, 2020

VIA MAIL

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request
Address of Incident: Johns Manville plant in Nashua, New Hampshire
Date of Incident: 1967 through Present

Dear Sir or Madam:

This firm serves as defense liaison counsel for several defendants in an action pending in Connecticut Superior Court. We are interested in obtaining information pursuant to the Freedom of Information Act, 5 U.S.C. 552.

Specifically, we request copies of any and all reports, documents, recordings, videotapes, photographs and/or other materials relating to any and all environmental impact caused to the Nashua, New Hampshire and other Southern New Hampshire areas by the Johns Manville Nashua Plant in Nashua, New Hampshire including its asbestos refill locations. In addition, we request the documents outlined in the attached Exhibit A.

We will, of course, pay the reasonable cost of any duplication that is necessary for you to respond to this FOIA request. If you have any questions regarding this inquiry, please feel free to contact me.

Thank you for your assistance with this request.

Very truly yours,



Sheldon R. Poole

EXHIBIT A

1. Any and all documents, correspondence, studies, reports and conclusions, communications and materials regarding the disposal of asbestos in any form waste from 1960 until present in the following areas:

- a. Nashua, New Hampshire; and
- b. Merrimack, New Hampshire.

2. Any and all documents correspondence, studies, reports and conclusions regarding the disposal of asbestos in any form waste from 1960 until present in the following specific locations:

- a. Silva Property, Interval Street, Nashua, NH
- b. Brown Property, Interval Street, Nashua, NH
- c. New Hampshire State Armory, Route 3, Nashua, NH
- d. Dora Street (Off Lund Rd.) in Nashua, NH
- e. Lamothe Refrigeration Co., 6 Progress Ave., Nashua, NH
- f. McLaughlin's Moving Co., 20 Progress Ave., Nashua, NH
- g. Nashua Municipal Landfill (previously) located on Route 111, Nashua, NH
- h. The Nashua River

3. Any and all documents, correspondence, reports, communications and materials regarding regulatory action taken against any entity and/or individual associated with the improper disposal of asbestos waste in any form from 1960 until present in the following areas:

- a. Nashua, New Hampshire; and
- b. Merrimack, New Hampshire.

4. Any and all documents regarding regulatory action taken against any entity and/or individual associated with the improper disposal of asbestos waste in any form from 1960 until present in the following specific locations:

- a. Silva Property, Interval Street, Nashua, NH
- b. Brown Property, Interval Street, Nashua, NH
- c. New Hampshire State Armory, Route 3, Nashua, NH
- d. Dora Street (Off Lund Rd.) in Nashua, NH
- e. Lamothe Refrigeration Co., 6 Progress Ave., Nashua, NH
- f. McLaughlin's Moving Co., 20 Progress Ave., Nashua, NH
- g. Nashua Municipal Landfill (previously) located on Route 111, Nashua, NH
- h. The Nashua River.

5. Any and all documents, correspondence, reports, communications and materials regarding citations or administrative and or legal enforcement action taken against any entity and/or individual associated with the improper disposal of asbestos waste in any form from 1960 until present in the following areas:

- a. Nashua, New Hampshire; and
- b. Merrimack, New Hampshire.

6. Any and all documents regarding documents, correspondence, reports, communications and materials regarding citations or administrative and or legal enforcement action taken against any entity and/or individual associated with the improper disposal of asbestos waste in any form from 1960 until present in the following specific locations:

- a. Silva Property, Interval Street, Nashua, NH
- b. Brown Property, Interval Street, Nashua, NH
- c. New Hampshire State Armory, Route 3, Nashua, NH
- d. Dora Street (Off Lund Rd.) in Nashua, NH
- e. Lamothe Refrigeration Co., 6 Progress Ave., Nashua, NH
- f. McLaughlin's Moving Co., 20 Progress Ave., Nashua, NH
- g. Nashua Municipal Landfill (previously) located on Route 111, Nashua, NH
- h. The Nashua River.